

Mr. David Reaves
Flight Standards Service
Aviation Safety Inspector

Mr. Reaves,

Thank you for clarifying which petition for exemption that this response applies to. Please find the follow RFI response.

1. The exemption number for Rocoza, LLC was a typo and should have read Exemption No. 18799. The Rocoza, LLC Exemption is similar in nature to the KDS operation because they use the DJI Agras T16 UAS for their Aerial Aircraft Operation. The FAA has completed an extensive risk analysis for the T16 for the Rocoza exemption. Their decision and approval letter is dated May 19, 2021.

2. Kona Drone Service UAS Training

KDS basically has one employee, the owner/operator, who will operate one DJI Agras T16 UAS. The owner meets the Part 91 requirement to hold a manned pilot certificate issued under Part 61. The certificate in this case is an ATP Rotorcraft, Helicopter certificate. In addition, the owner has a current Part 107 Remote Pilot Certificate.

A comprehensive training program is important for mitigation in larger companies where Remote pilot candidates may have no Part 61 pilot certification, and have limited aeronautical knowledge and experience.

KDS is a different model. A week-long training syllabus for one employee is not appropriate and is not going to add to safety. What will improve safety is to faithfully utilize check lists for mission planning, preflight, postflight, safety briefings and VO requirements. Check lists are preventive in nature. They reduce risks and increase safety. KDS will utilize laminated checklists for the all sUAS and UAS operations.

ADDITIONAL TRAINING: Kona coffee farms are small and planted mostly on sloped topography. Aerial spraying the farms offers a different challenge than spraying large acreages on flat farm land with no obstacles.

On-site UAS training on the coffee farms in Hawaii was included with the purchase of the DJI spray package which included the Phantom 4 RTK, D-RTK2 base, Agras T16, 2600W Intelligent Battery charger, and numerous batteries. The DJI engineer/pilot will come to Kona this winter in the post-harvest season for two or more days of on-the-job training with the Agras T16 UAS.

This training offers an invaluable opportunity to improve safety and increase knowledge that will be incorporated into best practice procedures for the KDS Aerial Aircraft Operation. Training will be done without compensation for hire.

3. Support documents have been sent.
4. The correct maximum weight on page 19 was a typo and should read 92.59 pounds.

5. This phrase may have been taken out of context as the sentence was prefaced with “While Part 107 will not apply to the proposed operations”. To be clear the KDS operation will be conducted in accordance with those portions of Part 137 from which KDS was not exempted.

Respectfully,

Ray Anders